

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE

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Docket No. N2011-1

**INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE
TO CENTER FOR STUDY OF RESPONSIVE LAW
WITNESS JEFFREY MUSTO
(USPS/CSRL-T1-1 THROUGH 13)**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of Practice and Procedure, the Postal Service respectfully submits the following discovery requests to Center for Study of Responsive Law witness Jeffrey Musto (CSRL-T-1). Incorporated herein are the definitions and instructions accompanying the September 29, 2011 interrogatories directed by the Postal Service to NAPUS witness Artery.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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USPS/CSRL-T1-1

Please describe the "other Postal Service related projects" referenced at page 3, line 19 of your testimony.

USPS/CSRL-T1-2

Please refer to your testimony at page 8, lines 7-10. State your understanding of whether the proximity of nearby postal retail locations from the retail facility being studied under the USPS Handbook PO-101 discontinuance review process is measured in terms of the straight line distance or the driving distance.

USPS/CSRL-T1-3

Please quantify the "significant portion" of Retail Access Optimization Initiative candidate facilities to which you refer at page 8, line 37 of your testimony and explain the basis for your response.

USPS/CSRL-T1-4

Please refer to page 4, line 5 of your testimony and describe what you mean by the "equal provision of postal services to consumers" Please explain the basis for the assertion that the Postal Service obliged to provide "equal" service to customers.

USPS/CSRL-T1-5

Please refer to your testimony at page 6, lines 19-22. Cite the basis for your assertion that the Postal Service "must believe" that the existence of a specific mix or number of alternate access channels in proximity to an RAO initiative candidate facility, by itself and by definition, constitutes "sufficient" alternatives to justify closing the candidate facility.

USPS/CSRL-T1-6

Please refer to your testimony at page 6, lines 32-33. Is it your testimony that the discontinuance of any existing postal retail facility is contrary to the policies of Title 39 United States Code if it results in any diminution in access by members of a community to postal products and services? If not, please explain.

USPS/CSRL-T1-7

Please refer to your testimony at page 9, lines 24-25. For which of the specific "binding" transactions listed there do residents in communities potentially affected by the RAO Initiative rely on the Postal Service:

- (a) exclusively?
- (b) predominantly?
- (c) frequently?
- (d) infrequently?

Please explain the basis for your conclusions.

USPS/CSRL-T1-8

Please refer to your testimony at page 8, lines 37-40.

- (a) Please quantify the "significant portion of the subset of about 3,650" RAOI candidate facilities to which you refer at lines 37-38 and explain the basis for your response.
- (b) Please provide specific page and line citations to "the previous discussion" referenced at line 37.

USPS/CSRL-T1-9

Assume that the RAO Initiative results in the discontinuance of a Post Office and the community it served is left with a level of access to retail postal services that is indistinguishable from that available at a virtually identical community in which no Post Office has ever been located.

- (a) Is there specific information you would need to know to form a judgment whether either or both communities were being provided service consistent with the policies of Title 39 United States Code? If so, please describe the information you deem relevant to each judgment.
- (b) Would the absence of a Post Office in either community, by itself, in your view, signal non-compliance with Title 39? Please explain your response.

USPS/CSRL-T1-10

Please refer to your testimony at page 9, lines 25-28.

- (a) Please describe the types of critical emergency and medical supplies that are shipped by mail in the aftermath of natural disasters or breaches of national security to adversely impacted individuals.
- (b) Is it your testimony that the number of postal retail facilities should be expanded to provide more outlets for the distribution of critical emergency and medical supplies in the event of natural disasters or national security breaches?
- (c) To your knowledge, are there circumstances when a natural disaster or national security breach can prevent or deter the Postal Service from providing retail or delivery service within specified areas for an extended period of time?
- (d) If postal retail access is limited in the aftermath of a natural disaster or breach of national security, could there be any advantage to postal customers having access to alternative access channels to conduct common basic transactions such as stamp purchases?
- (e) Assume postal retail access is limited in a community for reasons wholly unrelated to a natural disaster or breach of national security, and solely a consequence of the discontinuance of a Post Office in that community, leaving those customers the option of travelling to a nearby Post Office, not prohibitively far away. Would there be an advantage to postal customers having available alternative access channels (that are closer than the remaining nearby Post Office) at which to conduct the most common postal retail transaction, the purchase of stamps?

USPS/CSRL-T1-11

Please refer to your testimony beginning at page 8, line 46. Do stamps on consignment outlets provide a "sufficient" level of service to postal patrons at times when the sole objective of those customers is to obtain generic First-Class Mail letter rate stamps? If your answer is not fully affirmative, please explain.

USPS/CSRL-T1-12

Please refer to your testimony at page 9, lines 32-24. Please quantify what you mean by "prohibitively far" and explain the basis for your determination.

USPS/CSRL-T1-13

Please refer to your testimony at page 9, lines 21-22. Please fully describe the "devastation" that could be experienced by communities and consumers that surround a Post Office solely as a result of that Post Office closing. In doing so, please isolate such devastation from any that could be attributable to concurrent economic, sociological, political, or other phenomena also affecting those communities and individuals.